

February 16, 2018

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re:** Elimination of Obligation to File Broadcast Mid-Term Report (Form 397) Under Section 73.2080(f)(2), Modernization of Media Regulation Initiative, MB Docket Nos. 18-23, 17-105

Dear Ms. Dortch:

On February 15, Yosef Getachew of Common Cause spoke by telephone to David Grossman, Chief of Staff and Media Policy Advisor to Commissioner Clyburn, with regard to the above captioned proceeding.

We discussed Michael Copps', Common Cause Special Advisor to the Media and Democracy Reform Initiative, opposition to eliminating the mid-term review of broadcast stations' equal employment opportunity (EEO) practices.<sup>1</sup> Given the Federal Communications Commission's (FCC) poor track record of improving broadcasters' performance in hiring a diverse workforce, eliminating EEO reporting requirements sends a bad message the agency is abandoning its public interest responsibilities. Broadcasters are stewards of the public airwaves, and they have a responsibility to hire diverse talent as they build their workforce. The FCC must do all it can to advance diverse hiring practices among broadcasters.

Respectfully submitted,

/s Yosef Getachew

Director of Media and Democracy Program  
Common Cause  
805 15th Street, NW, Suite 800  
Washington, DC 20005

Cc: David Grossman

---

<sup>1</sup> See Elimination of Obligation to File Broadcast Mid-Term Report (Form 397) Under Section 73.2080(f)(2), Modernization of Media Regulation Initiative, Notice of Proposed Rulemaking, FCC-CIRC1802-04 (Feb. 1, 2018), [https://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2018/db0201/DOC-348987A1.pdf](https://transition.fcc.gov/Daily_Releases/Daily_Business/2018/db0201/DOC-348987A1.pdf).